

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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03-MDL-1570(GBD)(SN)

In re:

**TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001**

**DECLARATION OF JERRY  
S. GOLDMAN, ESQ. IN  
SUPPORT OF PLAINTIFFS'  
MOTION FOR LEAVE TO  
FILE IRAN NOTICES OF  
AMENDMENT NUNC PRO  
TUNC**

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This document relates to:

*Kim et al. v. Islamic Republic of Iran*, No. 18-CV-11870 (GBD) (SN);  
*DeRubbio et al. v. Islamic Republic of Iran*, No. 18-CV-05306 (GBD) (SN);  
*Kamardinova et al. v. Islamic Republic of Iran*, No. 18-CV-05339 (GBD) (SN);  
*Hemenway et al. v. Islamic Republic of Iran*, No. 18-CV-12277 (GBD) (SN);  
*Jimenez et al. v. Islamic Republic of Iran*, No. 18-CV-11875 (GBD) (SN);  
*Rowenhorst et al. v. Islamic Republic of Iran*, No. 18-CV-12387 (GBD) (SN);  
*O'Neill et al., v. Islamic Republic of Iran*, No. 1:04-CV-01076 (GBD) (SN);  
*Aamoth et al. v. Islamic Republic of Iran*, No. 18-CV-12276 (GBD) (SN);  
*Abel et al. v. Islamic Republic of Iran*, No. 18-CV-11837 (GBD) (SN).

JERRY S. GOLDMAN, Esq., hereby states under penalty of perjury, as provided for by 28 U.S.C. § 1746, as follows:

1. I am an attorney representing Plaintiffs in the above-captioned matters, and I submit this declaration in support of the Motion for Leave to File Iran Notices of Amendment *Nunc Pro Tunc*.

2. Attached hereto as Exhibits A – I are the Iran Notices of Amendment *Nunc Pro Tunc* which Plaintiffs seek leave to file in the existing civil cases of the decedents' estates (not in the MDL).

3. The form of this motion and the relief requested herein are intended to comply with Court's Order dated July 10, 2018 (ECF No. 4045), attached hereto as Exhibit J, stating: “[a] new plaintiff asserting claims for solatium damages with respect to a deceased family member whose estate filed claims against Saudi Arabia or Iran before the date of this Amended Order may be added to the existing case of the decedent's estate . . . by (1) filing a Notice of Amendment . . . in the existing civil case of the decedent's estate . . .” ECF No. 4045, at 6.

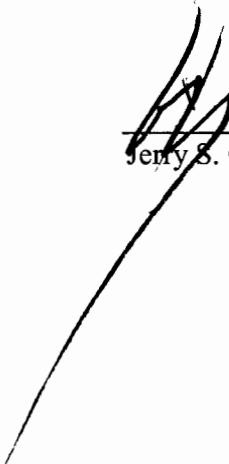
4. The Plaintiffs identified in Exhibits A – I have previously been awarded a final default judgment on liability and damages against the Islamic Republic of Iran in relation to the September 11<sup>th</sup> terrorist attacks.

5. As set forth in prior declarations, I have complied with the due diligence safeguards referenced in Sections II.C-D of the January 23, 2017 letter from the Plaintiffs' Executive Committees (ECF No. 3433).

- a. Plaintiffs are each immediate family members of decedents from the terrorist attacks on September 11, 2001, as specifically identified in Exhibits A – I;
- b. With respect to each estate plaintiff, the personal representative has provided the undersigned counsel with proof that he or she has been appointed by the court as the personal representative of the deceased relative; and,
- c. Prior to being awarded a final default judgment in the above-referenced matters, no relief has previously been awarded to any plaintiff identified on Exhibits A – I.

6. An official transcript of the Court Conference held on September 23, 2019, is attached hereto as Exhibit K.

Dated: New York, New York  
October 2, 2019

  
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Jerry S. Goldman, Esq.